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JoshCo Tech, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOSHCO TECH, LLC, a Nevada limited liability company,

Plaintiff,

v.

MAX VA BENEFITS CONSULTING SERVICES, INC. a California corporation;
JOSE BRICENO, an individual,

Defendant.

Case No.: 2:20-cv-00450-APG-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME
TO FILE OPPOSITION TO
DEFENDANTS' MOTION TO STAY
DISCOVERY PENDING
RESOLUTION OF ITS MOTION TO
DISMISS PLAINTIFF'S COMPLAINT**

(First Request)

Pursuant to Rule 6 of the Federal Rules of Civil Procedure and District of Nevada Local Rule 6-1, Plaintiff JoshCo Tech, LLC ("JoshCo Tech") and Defendants Max VA Benefits Consulting Services, Inc. ("MaxVA") and Jose Briceno's ("Briceno") (collectively, "Defendants") state the following:

1. On July 1, 2020 Defendants filed Defendants' Motion to Stay Discovery Pending Resolution of Its Motion to Dismiss Plaintiff's Complaint ("Motion to Stay") (ECF No. 22);

2. Pursuant to Rules 6(a) and (d) of the Federal Rules of Civil Procedure and pursuant to Local Rule 7-2, JoshCo Tech has until July 15, 2020 to file and serve their opposition to the

1 Motion to Stay; and

2 3. On or about July 13, the parties' counsel conferred regarding their schedules, client
3 availability and the general press of business; as a result, JoshCo Tech agreed to provide
4 Defendants a 30-day extension for JoshCo Tech's previously served written discovery responses,
5 and the parties agreed to provide reciprocal extensions on the briefing schedule for the Motion to
6 Stay;

7 4. Accordingly, the parties hereby agree and stipulate that JoshCo Tech shall have up
8 to and through Wednesday, August 5, 2020, to file and serve their opposition to the Motion to
9 Stay and Defendants shall have up to and through September 2, 2020 to file and serve their reply
10 to the Motion to Stay.

11 **IT IS SO AGREED AND STIPULATED.**

12 DATED this 15th day of July, 2020.

13 THE LAW OFFICE OF
14 RICHARD R. RICE

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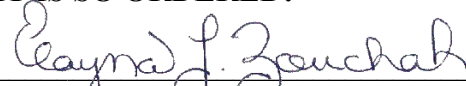
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and Jose Briceno

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JoshCo Tech, LLC

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: July 15, 2020